

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MODESTINE SMITH THORPE,
individually and on behalf of all persons
similarly situated,**

Plaintiff,

v.

GOLDEN AGE HOME CARE, INC.,

Defendant.

Civil Action No.: 2:17-cv-01187-TR

Class and Collective Action

**PLAINTIFF’S UNOPPOSED MOTION FOR
APPROVAL OF ATTORNEYS’ FEES AND COSTS**

Pursuant to Federal Rule of Civil Procedure 23(h), Class Counsel for Plaintiff Modestine Smith Thorpe (“Plaintiff” or “Thorpe”), individually and on behalf of all others similarly situated, respectfully seeks reimbursement for attorneys’ fees in the amount of Two Hundred Forty-One Thousand, Six Hundred Sixty-Six Dollars and Sixty-Seven Cents (\$241,666.67) (which is one-third of the Gross Settlement Amount), and the payment of out-of-pocket costs incurred by Class Counsel, which currently are \$1,697.98, as established by the Settlement Agreement between Plaintiff and Defendant Golden Age Home Care, Inc. (“Defendant”).

This Motion is based on the accompanying Memorandum of Law, the Declaration of Sarah R. Schalman-Bergen, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendant does not oppose this Motion. Plaintiff will submit a proposed Order in connection with her Motion for Final Approval of the Settlement.

Dated: August 6, 2018

Respectfully submitted,

/s/ Sarah R. Schalman-Bergen

Shanon J. Carson

Sarah R. Schalman-Bergen

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Attorneys for Plaintiff and the Settlement Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon counsel for Defendant through the Court's ECF system this 6th day of August, 2018.

/s/ Sarah R. Schalman-Bergen
Sarah R. Schalman-Bergen